

Remarks

The Examiner has indicated that Claims 34-66 are subject to a restriction requirement. More specifically, the Examiner has asserted that restriction to one of the following “species” is required:

- Species I: Claims 35, 38-40, 47, 50, 52, and 60, drawn to a holding and gripping means comprising a vacuum cup;
- Species II: Claims 36-40, 48, 50, and 52, drawn to a holding and gripping means comprising an electromagnetic means;
- Species III: Claims 37, 49, and 59, drawn to a holding and gripping means comprising a retaining means; and
- Species IV: Claims 42, and 53-57, drawn to a holding and gripping means comprising steering wheels.

Further, the Examiner has indicated that claims 34, 39, 43-46, 58, and 61-66 are generic to all species.

Subject to Applicant’s **traverse** below, Applicant elects Species III for prosecution at this time, and identifies Claims 34, 37, 39-46, 49, and 51-66 as being readable on the elected “species.”

Initially, it should be noted that all of the claims that the Examiner indicates are separate “species” are dependant claims, and that all ultimately depend from the same claims (i.e., claim 1 or claim 43). Applicant respectfully traverses the Examiner’s identification of species, and respectfully submits that Species IV are not distinct from Species I-III, but rather relate to a single general inventive concept. As clearly shown in

Fig. 5 of the present application, the steering wheels are utilized for moving a platform on a surface of the wind turbine tower, and can be used together with suction cups, electromagnetic means and/or retaining means. Accordingly, Applicant respectfully submits that claims 42 and 53-57 are also generic to all species.

Further, Applicant respectfully traverses the Examiner's identification of claims that are readable of Species I-III. Firstly, Applicant disagrees with the Examiner's identification of claims 39 and 40 as readable only on Species I and II and submits that these claims are generic to all species. These claims do not recite technical features of the holding and gripping means, but rather recite the steps of moving the work platform by extracting or retracting horizontal forcing means of the platform, and thus are generic to all species identified by the Examiner.

Secondly, Applicant respectfully disagrees with the Examiner's identification of claims 51 and 52 as being readable on Species I and II only. These claims recite structural features of a holding arm of the work platform, i.e. a base arm section, an inner arm section, etc., which are equally applicable to all species identified by the Examiner.

Thirdly, Applicant respectfully submits that claims 59 and 60 are also generic to all identified species. Claim 60 is dependent on claim 59, which is directed to retaining means for retaining a wind turbine blade. Applicant points out that the retaining means recited in claim 59 is not the same retaining means as recited in claims 37 and 49. Claims 37 and 49 recite the means for attaching the work platform directly to the wind turbine tower, wherein claim 59 recites the means for holding the wind turbine blade in

place while it is being serviced. Accordingly, claims 59 and 60 recite the features that are generic to all species, as identified by the Examiner.

Finally, Applicant points out that the Examiner did not identify claims 41 and 42 either as being readable on one of the identified species or as being generic. Applicant respectfully submits that these claims are also generic to all species.

Irrespective of the above traverse, Applicant reserves the right, in the event that generic claims are allowed, to have the Examiner consider all species on which these generic claims read, as provided by 37 C.F.R. 1.141. Additionally, any non-examined claims are reserved for filing in future applications.

Respectfully submitted,

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